

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION**

In re:

:
:

: Chapter 11

:

: Case No. 20-20182 (DRJ)

:

: (Jointly Administered)

Debtors.

:
X

J. C. PENNEY COMPANY, INC., *et al.*¹

**VERIFIED STATEMENT OF KLESTADT WINTERS JURELLER SOUTHARD &
STEVENS, LLP, PURSUANT TO FEDERAL RULE OF
BANKRUPTCY PROCEDURE 2019**

Klestadt Winters Jureller Southard & Stevens, LLP (“KWJS&S”), hereby submits this verified statement (the “Statement”) in accordance with Rule 2019 of the Federal Rules of Bankruptcy Procedure, and respectfully represents:

1. KWJS&S currently represents the following creditors and parties-in-interest in the above-captioned Chapter 11 cases (the “Chapter 11 Cases”) of J. C. Penney Company, Inc., *et al.* (collectively, the “Debtors”):

(a) Richline Group, Inc., 1385 Broadway, 12th Floor, New York, NY 10018 (“Richline”). Richline is a creditor of one or more of the Debtors and a consignor of certain consigned goods. Richline holds pre- and post-petition claims against the Debtors in an aggregate amount of not less than \$18,400,000.00, inclusive of claims related to consignment merchandise currently at the Debtors.

(b) Allure Gems, LLC, 1212 Avenue of the Americas, 14th Floor, New York, NY 10036 (“Allure”). Allure is a creditor of one or more of the Debtors and a consignor of certain consigned goods. Allure holds pre- and post-petition claims against the Debtors in an aggregate amount of not less than \$40,171,000.00, inclusive of claims related to consignment merchandise currently at the Debtors.

¹ A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors' claims and noticing agent at <http://cases.primeclerk.com/JCPenney>. The location of Debtor J.C. Penney Company, Inc.'s principal place of business and the Debtors' service address in these chapter 11 cases is 6501 Legacy Drive, Plano, Texas 75024.

(c) B.H. Multi Com Corp., 15 West 46th Street, New York, NY 10036 (“BHM Com Corp”). BHM Com Corp is a creditor of one or more of the Debtors and a consignor of certain consigned goods. BHM Com Corp holds pre- and post-petition claims against the Debtors in an aggregate amount of not less than \$4,860,403.00, inclusive of claims related to consignment merchandise currently at the Debtors.

(d) B.H. Multi Color Corp., 15 West 46th Street, New York, NY 10036 (“BHM Color Corp”). BHM Color Corp is a creditor of one or more of the Debtors and a consignor of certain consigned goods. BHM Color Corp holds pre- and post-petition claims against the Debtors in an aggregate amount of not less than \$1,958,685.00, inclusive of claims related to consignment merchandise currently at the Debtors.

(e) Renaissance Jewelry New York, Inc., 3 East 54th Street, Suite 603, New York, NY 10022 (“RJNY”). RJNY is a creditor of one or more of the Debtors and a consignor of certain consigned goods. RJNY holds pre- and post-petition claims against the Debtors in an aggregate amount of not less than \$3,631,553.00, inclusive of claims related to consignment merchandise currently at the Debtors.

(f) Jay Gems, Inc. 3 East 54th Street, Suite 603, New York, NY 10022 (“JG”). JG is a creditor of one or more of the Debtors and a consignor of certain consigned goods. JG holds pre- and post-petition claims against the Debtors in an aggregate amount of not less than \$1,989,454.00, inclusive of claims related to consignment merchandise currently at the Debtors.

(g) Goldiam USA, Inc., 22 West 48th Street, #305, New York, NY 10036 (“Goldiam”). Goldiam is a creditor of one or more of the Debtors and a consignor of certain consigned goods. Goldiam holds pre- and post-petition claims against the Debtors in an aggregate amount of not less than \$4,055,000.40, inclusive of claims related to consignment merchandise currently at the Debtors.

(h) SHR Jewelry Group, LLC, 529 Fifth Avenue, 16th Floor, New York, NY 10017 (“SHR”). SHR is a creditor of one or more of the Debtors and a consignor of certain consigned goods. Goldiam holds pre- and post-petition claims against the Debtors in an aggregate amount of not less than \$109,290.00, inclusive of claims related to consignment merchandise currently at the Debtors.

2. KWJS&S has been asked by Richline, Allure, BHM Com Corp, BHM Color Corp, RJNY, JG, Goldiam, and SHR to provide legal representation in the Chapter 11 Cases.
3. KWJS&S does not presently own, nor has it previously owned, any claims against, or interests in, the Debtors.

4. Nothing contained in this Statement is intended or should be construed to constitute (a) a waiver or release of any claims filed or to be filed against the Debtors held by Richline, Allure, BHM Com Corp, BHM Color Corp, RJNY, JG, Goldiam, or SHR, or (b) an admission with respect to any fact or legal theory. Nothing herein should be construed as a limitation upon, or waiver of, any rights of Richline, Allure, BHM Com Corp, BHM Color Corp, RJNY, JG, Goldiam, or SHR to assert, file and/or amend any proof of claim in accordance with applicable law and any orders entered in the Chapter 11 Cases.

The undersigned certifies that this verified statement is true and accurate, to the best of my knowledge, information, and belief. KWJS&S reserves the right to revise, supplement and/or amend this verified statement as may be appropriate or necessary.

Dated: New York, New York
May 30, 2020

**KLESTADT WINTERS JURELLER
SOUTHARD & STEVENS, LLP**

By: /s/ Andrew C. Brown
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(admitted *pro hac vice*)
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on May 30, 2020, a true and correct copy of the forgoing was served via the Court's ECF system on those parties registered to receive ECF notices by the Court.

/s/ Andrew C. Brown
Andrew C. Brown